



Consolidated Communications Network of Colorado, Inc.

*Consolidated Communications Network of Colorado, Inc.
9008 No. U.S. Highway 85, Unit E
Littleton, Colorado 80125-9915*

October 22, 2007

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Chairman Kevin J. Martin:

I am writing on behalf of the State of Colorado's user group for the Statewide Digital Trunked Radio System and the impacts of the decision in proceeding 06-229 regarding a mandatory freeze on adding 700 MHz capable units to systems. The Consolidated Communications Network of Colorado (CCNC) is a solid users group for the Statewide Digital Trunked Radio System. CCNC works with the State of Colorado to provide training, operational and technical guidance for our system. This freeze will place Colorado agencies in a difficult position by not being able to add infrastructure or user radios for frontline public safety functions.

Colorado public safety and public sector agencies enjoy a robust wide area system that has recently added 700 MHz capabilities to the network. The system as it sits today has 144 sites serving over 700 user agencies with over 32,200 interoperating radios. Included is a 3 site 700 MHz only simulcast cell, several more 700 MHz only sites (using nearly 70 repeaters) and almost 17,000 radios that are 700/800 MHz capable radios. Two 700 MHz only sites cover critical infrastructure in downtown Denver; a large college and our State Capitol. Several of the agencies rely on the 700 MHz sites for in building penetration and area coverage enhancements not only for themselves, but also for mutual aid agencies. The Democratic National Convention is set for downtown Denver and many agencies will need the radios and infrastructure in order to be able to manage the response in support of the event. This includes infrastructure expansion for capacity and user radios for needed communications capability.

Our system continues to grow in user agencies and radio infrastructure. The freeze deadline places a burden on local governments as they are in the process of transitioning and expanding their radio capabilities. Colorado is in the process of rebanding all 800 MHz capable radios and has first hand knowledge of the impacts that 700 MHz rebanding will bring to Colorado.

Local governments through state and national grants have invested large amounts of money into sites that are literally in process of being installed and numerous radio purchases for existing user needs. Some site construction is limited during winter months; a freeze will literally delay dramatically the completion of sites and needed radio coverage.

Colorado's public safety and public sector agencies critically need a waiver on the date given to maintain our path of completion of sites and radio additions to the Statewide Digital Trunked Radio System.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael D. Coleman", with a long horizontal line extending to the right.

Michael D. Coleman
President of CCNC

President:
Vice President:

*Michael D. Coleman, Douglas County Sheriff's Office
Randy Smith, Jefferson County Sheriff's Office*

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*"Consolidated Communications Network of Colorado, Inc."
Incorporated October 8, 2002*